

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<b>In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION</b>	)	Master File No.: 12-md-02311 Honorable Marianne O. Battani Special Master Gene J. Esshaki
<b>In Re: All Auto Parts Cases</b>	)	2:12-MD-02311-MOB-MKM
<b>THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES</b>	)	

**DECLARATION OF DAVID A. MUNKITTRICK IN SUPPORT OF FCA US LLC'S  
OPPOSITION TO THE PARTIES' RENEWED MOTIONS TO COMPEL**

I, David A, Munkittrick, declare as follows:

I am an attorney at Proskauer Rose LLP, counsel for FCA US LLC ("FCA US"). I make this Declaration to place before the Court true and correct copies of the following exhibits in support of FCA US's Opposition to the Parties' Renewed Motions to Compel:

**Exhibit**

***Deposition Transcripts (Excerpts)***

1. August 29, 2016 Deposition of Michael Novak. (UNDER SEAL)
2. September 20, 2016 Deposition of Kelly Lynch. (UNDER SEAL)

***Declarations***

3. Declaration of Kelly Lynch, Purchasing Director at FCA US.
4. Declaration of Michael Novak, Vice President, Controlling at FCA US.
5. Feb. 17, 2016 Declaration of Kelly Lynch in support of FCA US's Opposition to the Parties' January 19, 2016 Motion to Compel.
6. Feb. 17, 2016 Declaration of Michael Novak, in support of FCA US's Opposition to the Parties' January 19, 2016 Motion to Compel.

**Exhibit**

***Meet and Confer Correspondence***

7. October 13, 2016 letter from Q. Fu (Parties) to the C. Kass (FCA US).
8. October 23, 2016 letter from C. Kass to Q. Fu.
9. October 28, 2016 letter from Q. Fu to C. Kass.
10. November 6, 2016 letter from C. Kass to Q. Fu.

***Briefs***

11. The Specified Subpoenaed Entities' Joint Opposition to the Parties' Motions to Compel (12-md-02311, ECF 1227).

Executed on November 22, 2016

/s/ *David A. Munkittrick*  
David A. Munkittrick